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United States Department of the Interior

NATIONAL PARK SERVICE  
Air Resources Division  
P.O. Box 25287  
Denver, CO 80225

May 7, 2001

N3615 (2350)

Mr. John Holt, Environmental Manager  
Western Area Power Administration  
Desert Southwest Region  
P.O. Box 6457  
Phoenix, Arizona 85005-6457

Dear Mr. Holt:

The Air Resources Division of the National Park Service (NPS) has reviewed the Draft Environmental Impact Statement (DEIS) for the Sundance Energy Project (Sundance) and offers these comments. This project would consist of a natural gas-fired simple cycle 600 MW power facility located southwest of Coolidge, Arizona. This site is located 75 km north-northwest of Saguaro National Park (NP), a federal Class I air quality area administered by the NPS. The Sundance facility would also be located 8 km south of Case Grande National Monument (NM), a Class II area administered by the NPS. The proposed project would consist of the construction and operation of an electric generating facility, construction of a 14-mile pipeline to supply natural gas to the proposed facility, the construction of a new double-circuit 230-kV transmission line, construction of a new single-circuit 230-kV transmission line, upgrade of the Signal Substation, and the addition of a 230-kV bay at the Coolidge Substation.

Based on the proposed emissions, the Sundance facility would exceed the Prevention of Significant Deterioration (PSD) applicability levels for nitrogen oxides, carbon monoxide, particulate matter, and volatile organic compounds. As a Federal Land Manager, the NPS is part of the PSD review and comment process for this project. The Sundance Energy PSD permit application is being processed by the Pinal County Air Quality Control District. The NPS is currently reviewing this PSD application and will be issuing additional comments regarding this project to the Pinal County Air Quality Control District. The comments presented in this letter are not to be considered the final comments of the NPS regarding this proposed project. Rather, this letter reflects only the comments of the NPS regarding this DEIS.

01/03

**Comment No. 01**

**Issue Code: 03**

The analysis of the proposed Facility indicates that the maximum ambient air impacts for all pollutants, and applicable averaging periods, were less than 4% of the NAAQS. See amended air quality in Section 4.2 in the FEIS and responses to Public Hearing Comment Nos. 05 and 08.

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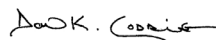
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This EIS incorporates many elements of the PSD analysis, and this information is presented on pages 4-13 through 4-17. The air quality impact analysis to assess impacts at Saguaro NP was performed using the EPA CALPUFF model. Table 4-14 indicates that visibility impacts at Saguaro NP would not exceed the NPS significant impact threshold of a 5% change in background extinction. An acid deposition impact analysis for Saguaro NP is also presented. Based upon the change in extinction and annual deposition results presented in this DEIS, the NPS does not believe that this project will cause an adverse impact to air quality or related values at Saguaro NP.

However, the NPS notes that no information regarding potential air quality impacts at Casa Grande NM is presented in this DEIS. Under the Organic Act of 1916, the NPS is directed by Congress "to conserve the scenery and the natural and historical objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations." Although classified as a Class II air quality area, the potential impacts that this proposed project may have on Casa Grande NM should be presented in this DEIS. Given the proximity of this proposed project to Casa Grande NM, such an analysis is vital to understanding the potential impacts associated with the proposed Sundance Energy Project. We request that visibility impact and acid deposition analyses be performed and the results included in the Final Environmental Impact Statement, and that any final decision regarding this proposed project be postponed until this information can be included in the decision-making process.

Although the DEIS does not present an assessment of potential air quality impacts at Casa Grande NM, the air quality sections that are included were very well done and thorough. We have also appreciated the regular updates and newsletters that were distributed as this document was prepared, and commend the Western Area Power Administration in their efforts to produce this document. If there are any questions regarding these comments, please feel free to contact me at (303) 969-2076.

Sincerely,



Don Coddling  
Environmental Protection Specialist  
Policy, Planning and Permit Review Branch

cc:  
Donald Gabrielson  
Pinal County Air Quality Control District  
P.O. Box 987  
Florence, Arizona 85232

02/03

03/03

04/03

**Comment No. 02**  
Comment noted.

**Issue Code: 03**

**Comment No. 03**

**Issue Code: 03**

At the request of the National Park Service for both the Sundance Energy PSD/Title V permit application and the Sundance Energy Environmental Impact Statement process, an Air Quality Related Values (AQRV) analysis was performed for the Casa Grande National Monument in Coolidge, approximately four miles north of the proposed Facility. The analysis was performed using the same CALPUFF/CALMET procedures described for the mandatory PSD AQRV analysis for the Class I Superstition Wilderness and the Saguaro West National Park.

The results of the analysis, shown in Table 1, demonstrate that the maximum visibility reduction is predicted to be 7.7% for one 24-hour period in February for the full year modeling analysis. Although one 24-period in February exceeded 5%, the next highest 24-hour visibility reduction in February was 2.75%. Therefore, according to the procedures developed by the Federal Land Managers (Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, December 2000), the proposed Facility would not have an adverse effect on visibility at the Casa Grande National Monument.

**Comment No. 03 (cont.)**

**Issue Code: 03**

<b>Table 1</b>	
<b>Visibility Impacts at Casa Grande National Monument</b>	
<b>Month</b>	<b>Maximum 24-Hour Visibility Reduction (%)</b>
January	2.81
February	7.73 – next highest 2.75
March	3.98
April	3.88
May	4.05
June	2.43
July	1.66
August	2.02
September	3.11
October	1.73
November	2.66
December	3.69

In addition to a visibility analysis, acid deposition (wet and dry) of sulfur and nitrogen was also calculated at the Casa Grande National Monument using the procedures described in the aforementioned FLAG document. The results of the analysis are shown in Table 2.

<b>Table 2</b>		
<b>Deposition at Casa Grande National Monument</b>		
<b>Month</b>	<b>Maximum 24-Hour Deposition (kilograms/hectare)</b>	
	<b>Nitrogen</b>	<b>Sulfur</b>
January	0.00723	0.00059
February	0.00413	0.00040
March	0.00227	0.00029
April	0.00131	0.00025
May	0.00117	0.00014
June	0.00364	0.00024
July	0.00253	0.00028
August	0.00300	0.00041
September	0.00537	0.00042
October	0.00031	0.00005
November	0.00284	0.00022
December	0.00169	0.00013

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**Comment No. 04**  
Comment noted.

**Issue Code: 03**

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San Francisco, CA  
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United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
600 Harrison Street, Suite 515  
San Francisco, California 94107-1976

April 30, 2001

ER 01/199

Mr. John Holt, Environmental Manager  
Western Area Power Administration  
Desert Southwest Region  
P.O. Box 6457  
Phoenix, AZ 85005-6457

Dear Mr. Holt:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (EIS) for the Sundance Energy Project, Pinal County, AZ, and has no comments to offer.

Thank you for the opportunity to review this document.

Sincerely,

Patricia Sanderson Port  
Regional Environmental Officer

cc:  
Director, OEPC, w/original incoming  
Regional Director, FWS, Albuquerque

No comments.